

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: TIKTOK INC. CONSUMER PRIVACY LITIGATION	MDL No. 2948 No.1:20-cv-04699 Hon. John Z. Lee
E.R. , a Minor, through her Guardian, L.H. , K.M. , a Minor, through her Guardian, C.M. , D.M. , a minor, through her Guardian, D.H. , L.B. , a minor, by and through his or her guardian, Molly Janik, H.S. , a Minor, through her Guardian, J.S. , N.T. and L.T. , minors, by and through their guardian, Darcy Tellone, S.P. , J.P. , K.P. , G.P. , minors, by and through their guardian, Katie Patterman, each individually and on behalf of all others similarly situated, Plaintiffs, v. TIKTOK, INC. and BYTEDANCE, INC., Defendants.	No. 1:20-cv-02810 CONSOLIDATED ACTION Hon. John Z. Lee

JOINT STATUS REPORT

As ordered by this Court on June 18, 2020 [ECF No. 37], Plaintiffs and Defendants submit this joint status report and state as follows:

1. This Consolidated Action includes seven of the nineteen cases subject to the recent centralization order issued by the Judicial Panel on Multi-District Litigation (“JPML”) on August 4, 2020 selecting this Court as the transferee district (hereinafter the “MDL”). *See*

Exhibit A attached hereto. The administrative transfer of cases subject to the JPML's Transfer Order has not yet been completed.

2. This Court appointed Katrina Carroll as interim lead Plaintiffs' counsel for this Consolidated Action, pending the JPML proceedings. [ECF No. 18]. During the pendency of the proceedings before the JPML, Ms. Carroll worked successfully with defense counsel to arrange for and schedule a global mediation of all claims subject to the JPML petition.

3. All counsel in the Consolidated Action, along with counsel in every other case subject to the JPML proceedings (except for counsel in the Consolidated Northern District of California action) worked cooperatively and efficiently in preparing for the mediation and, more generally, throughout the history of this litigation. On August 13, 2020, representatives on behalf of 11 of 19 cases in the MDL (together with defense counsel, the "Settling Parties") participated in a 12-hour mediation session with the Honorable Layn Phillips.

4. As a result of the good work of Judge Phillips, and all participating parties and their counsel, the Settling Parties reached a settlement in principle, subject to certain conditions, which will resolve all of the claims asserted in the MDL, on a class-wide basis.

5. Defendant TikTok is currently subject to a presidential executive order issued August 6, 2020 that threatens to ban TikTok from conducting business in the United States. TikTok is also reportedly a potential target for acquisition by multiple third parties, as mentioned in recent news articles. In light of these factors, it is imperative to TikTok to maintain the mediation privilege and strict confidentiality concerning the terms of the settlement until the settlement is disclosed publicly and to this Court, as part of the settlement approval process pursuant to Fed. R. Civ. P. 23.

6. The Settling Parties anticipate finalizing the settlement, satisfying the necessary conditions, and being able to file a motion for preliminary approval of the settlement within 90 days.

7. The Settling Parties support a stay of the cases comprising the MDL, pending the filing of the motion for preliminary approval of the settlement. The Settling Parties further suggest that this Court schedule the initial status conference for the MDL on the same date as the hearing for preliminary approval of the settlement, which should occur on or before November 16, 2020.

Respectfully submitted,

Date: August 16, 2020

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CERTIFICATE OF SERVICE

I hereby certify that on August 16, 2020, the foregoing document was filed electronically through the Court's Electronic Case Filing System. Service of this document is being made upon all counsel of record in this case by the Notice of Electronic Filing issued through the Court's Electronic Case Filing System on this date.

/s/ Katrina Carroll

Katrina Carroll